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August 31, 2016

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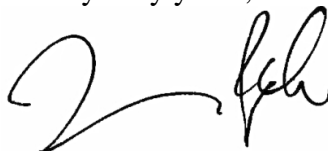
The Honorable Vernon S. Broderick
United States District Judge
Southern District of New York
40 Foley Square
New York, NY 10007

Re: United States v. Ng Lap Seng and Jeff C. Yin,
S4 15 Cr. 706 (VSB)

Dear Judge Broderick:

We write in response to the government's letter request for a conference to discuss the schedule in this case. In his letter, AUSA Richenthal states that he is concerned about the schedule because Mr. Ng joined in Mr. Yin's request for a two-week extension of time. We find this surprising. Mr. Yin's counsel made a modest request for a two week extension. On behalf of Mr. Ng, we consented to it, adding that if it is granted, we be given the same two weeks as well. The only reason for seeking identical treatment was to maintain a single defense schedule, rather than having two separate schedules. As that appears to have triggered the government's concerns and efforts to broadly revisit the trial schedule, we withdraw our request. We will file our motion as previously required, by September 12, and the government will be required to comply with its deadlines as to Mr. Ng's motion as previously ordered by the Court. Inasmuch as the government has taken no position as to Mr. Yin's request for the modest delay, we assume his request will not occasion any delay in schedule. Thus, we respectfully submit that there is no need for a conference. Of course, if the Court wishes to convene one notwithstanding the above, we will be available.

Very truly yours,

A handwritten signature in black ink, appearing to read 'Tai H. Park', with a stylized, flowing script.

Tai H. Park

cc: All counsel of record